

**REMARKS**

Claims 1-27 are pending and stand rejected.

The Final Office Action rejected claim 1-27 under 35 USC 102(b) as being anticipated by Goel et al., United States Patent No. 5,960,427.

Applicant respectfully disagrees.

1. Goel does not teach or suggest identifying one or more groups of consecutive values in a set, where the set is a set of values in a query, as required by independent claims 1, 10, and 19. Applicant can find no mention anywhere in Goel of identifying one or more groups of consecutive values in a set. The GROUPBY construct of SQL described in Goel does not perform this function. The GROUPBY construct “accepts as its argument a relation r and produces a new relation according to the subscripts X and f(Y).” Goel, col. 5, lines 52-55. “The subscript X specifies the attributes referenced in the GROUPBY statement.” Goel, col. 5, lines 56-57. “The subscript f(Y) specifies the aggregation (if present).” Goel, col. 5, line 63. Goel does not mention “consecutive values” in its discussion of the GROUPBY construct. Thus, Goel’s GROUPBY construct does not teach or suggest identifying one or more groups of consecutive values.

2. Goel does not teach or suggest removing equality conditions corresponding to the values in one or more of the identified groups and adding one or more inequality conditions corresponding to the one or more of the identified groups, as required by independent claims 1, 10, and 19. While Goel describes “pruning away redundant sub-expressions and . . . converting expensive binary operations to in-expensive binary operations,” col. 13, lines 25-28, this is not the same thing as removing equality conditions corresponding to the values in one or more of the identified groups and adding one or more inequality conditions corresponding to the one or more of the identified groups. The removed equality conditions in claims 1, 10, and 19 are not

“redundant.” Further, the Final Office Action has not demonstrated that removing the equality conditions and adding one or more inequality conditions in claims 1, 10, and 19 is the same thing as Goel’s converting expensive binary operations to in-expensive binary operations. Still further, Goel’s discussion of “‘Dam’ destruction” in col. 13, lines 33-45 does not provide these elements. The Final Office Action has not demonstrated that any of the techniques for “break[ing]-down firewalls” described in Goel at col. 13, lines 33-45 is the same as removing equality conditions corresponding to the values in one or more of the identified groups and adding one or more inequality conditions corresponding to the one or more of the identified groups, as required by independent claims 1, 10, and 19.

Thus, independent claims 1, 10, and 19 are patentable over Goel et al. The dependent claims all depend from claim 1, 10 or 19 and are patentable for at least the same reasons.

**SUMMARY**

Applicant contends that the claims are in condition for allowance, which action is requested. Applicant does not believe any additional fees beyond the fee for the one-month extension of time are necessary with the submitting of this response. Should any additional fees be required, Applicant requests that the fees be debited from deposit account number 14-0225, Order Number 11378.

Respectfully submitted,

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